MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Neo Industries(Indiana) Inc.
1775 Willow Creek Road
Portage, Indiana 46368

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-2, 40 CFR 52.21, and 40 CFR 52.124 (Prevention of Significant Deterioration), with conditions listed on the attached pages.

Operation Permit No.: MSOP 127-11444-00045	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary hard chromium electroplating plant for metal products.

Authorized Individual:	Joe Ewing
Source Address:	1775 Willow Creek Road, Portage, Indiana 46368
Mailing Address:	1775 Willow Creek Road, Portage, Indiana 46368
Phone Number:	(423) - 982-0008
SIC Code:	3471
County Location:	Porter
County Status:	Nonattainment area for Ozone Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) hard chromium electroplating tank, identified as North Tank, with a maximum rectifier capacity of fifty thousand (50,000) amperes and maximum capacity to coat four (4) metal rolls per hour, using composite mesh pad system/packed bed scrubber as control, and exhausting at one(1) stack, identified as 1.

(b) One (1) hard chromium electroplating tank, identified as South Tank, with a maximum rectifier capacity of thirty thousand (30,000) amperes and maximum capacity to coat four (4) metal rolls per hour, using composite mesh pad system/packed bed scrubber as control, and exhausting one(1) stack, identified as 1.

(c) Two (2) electrical discharge texturing tanks, identified as EDT1 and EDT2, each with a maximum capacity of one (1) metals roll per hour, using dry mist collectors as control, and exhausting inside the building.

(d) One (1) natural gas-fired boiler, identified as B1, rated at seven-tenths (0.7) million British thermal units (MMBtu) per hour, exhausting at one (1) stack, identified as 2.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a minor source, as defined in 326 IAC 2-7-1(22);

(b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act,

as defined in 326 IAC 2-7-1(3);

(c) It is not a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of all the criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit of VOC or NO_X to 25 tons per year or increase potential to emit of any other criteria pollutant to 100 tons per year from this source, shall cause this source to be considered a major source under Emission Offset, 326 IAC 2-3, and shall require approval from IDEM, OAM prior to making the change.

(c) Any change or modification which may increase potential to emit of VOC or NO_X to 25 tons per year, 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Testing Requirements

C.8 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and

expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.13 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly *(or Semi-annual if the source isn't required to do any quarterly reporting)* Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.15 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be

considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a)	One (1) hard chromium electroplating tank, identified as North Tank, with a maximum rectifier capacity of fifty thousand (50,000) amperes and maximum capacity to coat four (4) metal rolls per hour, using composite mesh pad system/packed bed scrubber as control, and exhausting at one(1) stack, identified as 1.
(b)	One (1) hard chromium electroplating tank, identified as South Tank, with a maximum rectifier capacity of thirty thousand (30,000) amperes and maximum capacity to coat four (4) metal rolls per hour, using composite mesh pad system/packed bed scrubber as control, and exhausting one(1) stack, identified as 1.

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart N.

D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks identified as North and South Tanks. A copy of this rule is attached. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks identified as North and South Tanks.

D.1.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

(a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.

(b) The hard chromium electroplating tanks, identified as North and South Tanks above, are considered a large, existing hard chromium electroplating operation. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 mg/dscm [6.6×10^{-6} gr/dscf].

D.1.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks identified as North and South Tanks:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks identified as North and South Tanks, including the composite mesh pad/packed bed scrubber and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.

(b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.

(c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.

(d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.

(e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAM may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAM finds that the plan:

(1) Does not address a malfunction or period of excess emissions that has occurred;

(2) Fails to provide for the operation of tanks identified as North and South Tanks, including the composite mesh pad/packed bed scrubber and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or

(3) Does not provide adequate procedures for correcting malfunctioning process equipment, composite mesh pad/packed bed scrubber and monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for North and South Tanks and the composite mesh pad system/packed bed scrubber.

D.1.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

(a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks identified as North and South Tanks. The OMP shall specify the operation and maintenance criteria for the tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and monitoring equipment and shall include the following elements:

(1) For the packed-bed scrubber/composite mesh-pad system (PBS/CMP):

(A) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

(B) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

(C) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.

(D) Perform washdown of the composite mesh-pads in accordance with manufacturers recommendations.

(E) A standardized checklist to document the operation and maintenance criteria for tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and the monitoring equipment.

(F) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.

(G) A systematic procedure for identifying malfunctions and periods of excess emissions of tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and the monitoring; and for implementing corrective actions to address such malfunctions and periods of excess emissions.

(b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).

(c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.

(d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.

(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of tanks identified as North and South Tanks or until the North and/or South Tanks are/is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

(a) A performance test demonstrating initial compliance for North and South tanks was performed on March 12, 1997. It was determined that the average pressure drop across the system was 5.6 inches of water and the average outlet chromium concentration was 0.0091 mg/dscm. A second performance test demonstrating compliance for North and South Tanks was performed on September 15, 1999. It was determined that the average pressure across the system was 2.0 inches of water and average outlet chromium concentration was 0.007189 mg/dscm.

(b) The Permittee is not required to further test tanks identified as North and South Tanks by this permit. However, the IDEM may require testing when necessary to determine if the tanks identified as North Tank and/or South Tank are/is in compliance. If testing is required by the IDEM, compliance with the limits specified in Condition D.X.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

(c) Any change, modification, or reconstruction of the tanks identified as North Tank and or South Tank, the composite mesh pad/packed bed scrubber or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-6.1-5(a)(2)][40 CFR 63.343 (c)]

(a) Pursuant to 40 CFR 63.343(c)(3) and 63.343(c)(1)(ii), when using a packed bed scrubber in conjunction with a composite mesh-pad system to comply with the limits specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated between 2.0 and 5.6 inches of water column of the pressure drop value established during the two(2) performance tests, or within the range of compliant values for pressure drop established during multiple performance tests.

(b) Tank operation or operating time is defined as that time when a part is in the tank and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less that fifteen minutes, that time between plating the two parts is considered operating time.

Record Keeping and Reporting Requirements[326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements [40 CFR 63.346]

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit, and include a minimum of the following:

(a) Inspection records for the composite mesh pad system/packed bed scrubber and monitoring equipment to document that the inspection and maintenance required by D.1.7 and D.1.8 have taken place. The record can take the form of a checklist and should identify the following:

(1) The device inspected;

(2) The date of inspection;

(3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and

(4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.

(b) Records of all maintenance performed on North and South Tanks, the composite mesh system/packed bed scrubber and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of North and/or South Tanks, the composite mesh system/packed bed scrubber and monitoring equipment.

(d) Records of actions taken during periods of malfunction when such actions are inconsistent with the OMP.

(e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.

(f) Test reports documenting results of all performance tests.

(h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.

(i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.

(j) The total process operating time, as defined in Condition D.1.8(b)of each tank, during the reporting period.

(k) Records of the actual cumulative rectifier capacity of each hard chromium electroplating tank expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

(l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.10.

D.1.10 Reporting Requirements [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347]

The notifications and reports required in this section shall be submitted to IDEM, OAM using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications
The Permittee shall notify IDEM, OAM in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAM, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tanks identified as North and South Tanks shall be submitted to IDEM, OAM no later than forty-five (45) days following completion of the compliance demonstration pursuant to Section C - Performance Testing.

(3) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM. In addition, the Permittee may not change, modify, or reconstruct tanks identified as North and South Tanks without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks identified as North and South Tank serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAM before construction, modification, or reconstruction may commence.

(b) Performance Test Results
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks identified as North and South Tank using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks identified as North and South Tanks are located at site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAM upon request.

(1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).

(A) The first report shall cover the period from the start-up date of the emissions units to December 31 of the year in which the emissions units begin operation.

(B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.

(2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAM:

(A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period; or

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.8(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

(3) IDEM, OAM may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

(c) Two (2) electrical discharge texturing tanks, identified as EDT1 and EDT2, each with a maximum capacity of one (1) metals roll per hour, using dry mist collectors as control, and exhausting inside the building.

(d) One (1) natural gas-fired boiler, identified as B1, rated at seven-tenths (0.7) million British thermal units (MMBtu) per hour, exhausting at one (1) stack, identified as 2.

Boilers

Emission Limitations and Standards

D.2.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating**,** the PM emissions from the 0.7 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

Compliance Determination Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM , compliance with the Particulate Matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	***Neo Industries(Indiana) Inc.***
Address:	**1775 Willow Creek Road**
City:	**Portage, Indiana 46368**
Phone #:	**(219) 762-6075**
MSOP #:	**127-11444-00045**

I hereby certify that Neo Industries(Indiana) Inc. is
9 still in operation.
9 no longer in operation.

I hereby certify that Neo Industries(Indiana) Inc. is
9 in compliance with the requirements of MSOP **127-11444-00045**.
9 not in compliance with the requirements of MSOP **127-11444-00045**

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____
_

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Minor Source Operating Permit

Source Name:	Neo Industries(Indiana) Inc.
Source Location:	1775 Willow Creek Road, Portage, Indiana 46368
County:	Porter
Operation Permit No.:	127-11444-00045
SIC Code:	3471
Permit Reviewer:	Spahi

On December 15, 1999, the Office of Air Management (OAM) had a notice published in the Vidette Messenger, Valparaiso, Indiana, stating that Neo Industries(Indiana) Inc. had applied for a minor source operating permit to operate a hard chromium electroplating plant for metal products. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes (changes are bolded for emphasis):

1) Condition D.1.2 is changed as follows:

D.1.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

~~This facility is subject to 40 CFR Part 63, Subpart N, which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached.~~

(a) ~~The Permittee shall not allow the concentration of total chromium in the exhaust gas stream discharged to the atmosphere from stack SO2 of PO2 to exceed 0.03 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (1.3 x 10-5 grains per dry standard cubic foot (gr/dscf)).~~

(b) ~~The following work practice standards for PO2 are also applicable~~:

(1) ~~At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain PO2, including the composite mesh pad system and monitoring equipment, in a manner consistent with the Operation and Maintenance Plan (OMP) required by D.2.4.~~

(2) ~~Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by D.2.4.~~

(3) ~~Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.~~

(4) ~~Revisions may be required if IDEM, OAM finds that the plan:~~

(A) ~~Does not address a malfunction that has occurred;~~

(B) ~~Fails to provide for the operation of PO2, the air pollution control~~

~~techniques, or the composite mesh pad system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or~~

(C) ~~Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.~~

The provisions of 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tanks identified as North and South Tanks. A copy of this rule is attached. The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks identified as North and South Tanks.

2) Condition D.1.3 and D.1.4 are being added to reflect the current permit language as follows:

D.1.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)]

(a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction.

(b) The hard chromium electroplating tanks, identified as North and South Tanks above, are considered a large, existing hard chromium electroplating operation. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 mg/dscm [6.6×10^{-6} gr/dscf].

D.1.4 Work Practice Standards [40 CFR 63.342(f)]

The following work practice standards apply to tanks identified as North and South Tanks:

(a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks identified as North and South Tanks, including the composite mesh pad/packed bed scrubber and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.1.6.

(b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.1.6.

(c) These operation and maintenance requirements are enforceable independent of emissions limitations or other requirements in this section.

(d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results; review of the OMP, procedures,

and records; and inspection of the source.

(e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAM may require that the Permittee make changes to the OMP required by Condition D.1.6. Revisions may be required if IDEM, OAM finds that the plan:

(1) Does not address a malfunction or period of excess emissions that has occurred;

(2) Fails to provide for the operation of tanks identified as North and South Tanks, including the composite mesh pad/packed bed scrubber and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or

(3) Does not provide adequate procedures for correcting malfunctioning process equipment, composite mesh pad/packed bed scrubber and monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

3) Condition D.1.3 is changed to condition D.1.5 as follows:

~~D.1.3~~ **D.1.5** Preventive Maintenance Plan ~~[326 IAC 2-7-5(13)]~~ **[326 IAC 1-6-3]**

~~A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for PO2 and the composite mesh pad system~~.

A Preventive Maintenance Plan (PMP), in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for North and South Tanks and the composite mesh pad system/packed bed scrubber.

3) Condition D.1.4 is changed to condition D.1.6 as follows:

~~D.1.4~~ **D.1.6** Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

(a) ~~An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3) shall be prepared and maintained and shall specify the operation and maintenance criteria for PO2, the composite mesh pad system and monitoring equipment and shall include the following elements:~~

(1) ~~Quarterly visual inspection of the composite mesh pad system to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;~~

(2) ~~Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist;~~

(3) ~~Quarterly visual inspection of the duct work from the tanks to the control device to ensure there are no leaks;~~

~~(4) Perform washdown of the composite mesh pads in accordance with manufacturer's recommendations.~~

~~(5) A standardized checklist to document the operation and maintenance criteria for PO2, the composite mesh pad system and monitoring equipment~~;

~~(6) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;~~

~~(7) A systematic procedure for identifying malfunctions of PO2, the composite mesh pad system and monitoring equipment; and for implementing corrective actions to address such malfunctions;~~

~~(b) The Permittee may use applicable standard operating procedures (SOP) manuals, occupational safety and health administration (OSHA) plans, or other existing plans such as the (PMP) required in D.2.3, as the OMP, provided the alternative plans meet the above listed criteria in D.2.4(a).~~

~~(c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining PO2, the composite mesh pad system, and monitoring equipment, during similar malfunction events, and a program for corrective action for such events.~~

~~(d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.~~

~~(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of PO2 or until PO2 is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.~~

(a) **The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the startup date of tanks identified as North and South Tanks. The OMP shall specify the operation and maintenance criteria for the tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and monitoring equipment and shall include the following elements:**

(1) For the packed-bed scrubber/composite mesh-pad system (PBS/CMP):

(2) Quarterly visual inspections of the device to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.

(3) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.

(4) Quarterly visual inspection of the duct work from the tank to the control device to ensure there are no leaks.

(5) Perform washdown of the composite mesh-pads in accordance with manufacturers recommendations.

(6) A standardized checklist to document the operation and maintenance criteria for tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and the monitoring equipment.

(7) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.

(8) A systematic procedure for identifying malfunctions and periods of excess emissions of tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and the monitoring; and for implementing corrective actions to address such malfunctions and periods of excess emissions.

(b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.1.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.1.6(a).

(c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining tanks identified as North and South Tanks, the composite mesh pad/packed bed scrubber and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.

(d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM.

(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of tanks identified as North and South Tanks or until the North and/or South Tanks are/is no longer subject to

the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

4) Condition D.1.7 shall be added to reflect the current permit language as follows:

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344]

(a) A performance test demonstrating initial compliance for North and South tanks was performed on March 12, 1997. It was determined that the average pressure drop across the system was 5.6 inches of water and the average outlet chromium concentration was 0.0091 mg/dscm. A second performance test demonstrating compliance for North and South Tanks was performed on September 15, 1999. It was determined that the average pressure across the system was 2.0 inches of water and average outlet chromium concentration was 0.007189 mg/dscm.

(b) The Permittee is not required to further test tanks identified as North and South Tanks by this permit. However, the IDEM may require testing when necessary to determine if the tanks identified as North Tank and/or South Tank are/is in compliance. If testing is required by the IDEM, compliance with the limits specified in Condition D.X.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

(c) Any change, modification, or reconstruction of the tanks identified as North Tank and or South Tank, the composite mesh pad/packed bed scrubber or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

5) Condition D.1.5 shall be changed to condition D.1.8 changed as follows:

~~D.1.5~~ **D.1.8** Monitoring to Demonstrate Continuous Compliance **[326 IAC 2-6.1-5(a)(2)]**[40 CFR 63.343 (c)]

(a) ~~A performance test demonstrating initial compliance for PO2 was performed on June 11, 1997. It was determined that the average pressure drop across the system was 2.00 inches of water and the average outlet chromium concentration is 0.00426 mg/dscm~~.

(b) ~~The Permittee shall monitor and record the pressure drop across the composite mesh pad system once each day that PO2 is in operation.~~

(c) ~~The composite mesh pad system shall be operated within 2.00 ± 1 inch of water column, the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests that may be conducted in the future.~~

(a) Pursuant to 40 CFR 63.343(c)(3) and 63.343(c)(1)(ii), when using a packed bed scrubber in conjunction with a composite mesh-pad system to comply with the limits specified in Condition D.1.3, the Permittee shall monitor and record the pressure drop across the composite mesh-pad system during tank operation once each day that the hard chromium electroplating tank is operating. To be in compliance with the standards, the composite mesh-pad system shall be operated between 2.0 and 5.6 inches of water column of the pressure drop value established

during the two(2) performance tests, or within the range of compliant values for pressure drop established during multiple performance tests.

(b) Tank operation or operating time is defined as that time when a part is in the tank and the rectifier is turned on. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less that fifteen minutes, that time between plating the two parts is considered operating time.

5) Condition D.1.7 is changed to condition D.1.9 as follows:

~~D.1.7~~ **D.1.9** Record Keeping Requirements [40 CFR 63.346]

(a) ~~The Permittee shall maintain records to document compliance with Conditions D.2.2 and D.2.4 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit, shall be kept for a period of five (5) years and include a minimum of the following:~~

(1) ~~Inspection records for the composite mesh pad system and monitoring equipment to document that the inspection and maintenance required by D.2.3 and D.2.4 have taken place. The record can take the form of a checklist and should identify the following:~~

(A) ~~The device inspected;~~

(B) ~~The date of inspection;~~

(C) ~~A brief description of the working condition of the device during the inspection, including any deficiencies found; and~~

(D) ~~Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken~~.

(2) ~~Records of all maintenance performed on PO2, the composite mesh system and monitoring equipment.~~

(3) ~~Records of the occurrence, duration, and cause (if known) of each malfunction of PO2, the composite mesh system and monitoring equipment.~~

(4) ~~Records of actions taken during periods of malfunction when such actions are inconsistent with the OMP.~~

(5) ~~Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.~~

(6) ~~Test reports documenting results of all performance tests and all measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.~~

(7) ~~Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.~~

(8) ~~The specific identification of each period of excess emissions, as indicated by monitoring data, that occurs during periods of malfunction of PO2, the composite mesh pad system, and monitoring equipment.~~

(9) ~~The specific identification of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of PO2, the composite mesh pad system, and monitoring equipment.~~

(10) ~~The total process operating time of PO2 during the reporting period.~~

(11) ~~All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.2.8.~~

(b) ~~Operating time for chrome electroplating is that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.~~

The Permittee shall maintain records to document compliance with Conditions D.1.3, D.1.4 and D.1.6 using the forms provided with this permit. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit, and include a minimum of the following:

(a) Inspection records for the composite mesh pad system/packed bed scrubber and monitoring equipment to document that the inspection and maintenance required by D.1.7 and D.1.8 have taken place. The record can take the form of a checklist and should identify the following:

(1) The device inspected;

(2) The date of inspection;

(3) A brief description of the working condition of the device during the inspection, including any deficiencies found; and

(4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.

(b) Records of all maintenance performed on North and South Tanks, the composite mesh system/packed bed scrubber and monitoring equipment.

(c) Records of the occurrence, duration, and cause (if known) of each malfunction of North and/or South Tanks, the composite mesh system/packed bed scrubber and monitoring equipment.

(d) Records of actions taken during periods of malfunction when such actions are inconsistent with the OMP.

(e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.

(f) Test reports documenting results of all performance tests.

(h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.

(i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.

(j) The total process operating time, as defined in Condition D.1.8(b)of each tank, during the reporting period.

(k) Records of the actual cumulative rectifier capacity of each hard chromium electroplating tank expended during each month of the reporting period, and the total capacity expended to date for a reporting period.

(l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.1.10.

6) Condition D.1.8 is changed to condition D.1.10 as follows:

~~D.1.8~~ **D.1.10** Reporting Requirements **[326 IAC 3-6-4(b)]** [**40 CFR 63.344(a), 63.345** and 63.347]

(a) ~~In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAM prior to any change, modification, or reconstruction of PO2 (including the addition of duct work to the composite mesh pad system) or construction of a new facility or source (affected, nonaffected, as defined in 40 CFR 63.344(e)). Notification shall be submitted as soon as practicable, but no earlier than thirty (30) days before the date construction or reconstruction commences.~~

(b) ~~In accordance with 40 CFR 63.347 (c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAM no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAM within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.~~

(c) ~~The Permittee shall notify IDEM, OAM in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347 (e), to the address listed in Section C - Performance Testing.~~

~~(b)~~ ~~The Permittee shall submit summary reports to document the ongoing compliance status of PO2 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable.~~

(1) ~~This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty~~

~~(30) days after the end of each reporting period (which ends June 30 and December 31 respectively) and submitted to the address listed in Section C - General Reporting Requirements.~~

(2) ~~If there are any exceedances of the chromium air emission limit contained in Condition D.2.2, then quarterly reports shall be submitted until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.~~

The notifications and reports required in this section shall be submitted to IDEM, OAM using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

(1) Initial Notifications
The Permittee shall notify IDEM, OAM in writing that the source is subject to 40 CFR Part 63, Subpart N. The notification shall be submitted no later than one hundred eighty (180) days after the compliance date and shall contain the information listed in 40 CFR 63.347(c)(1).

(2) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63 Subpart N.

(A) The NCS shall be submitted to IDEM, OAM, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).

(B) The NCS for tanks identified as North and South Tanks shall be submitted to IDEM, OAM no later than forty-five (45) days following completion of the compliance demonstration pursuant to Section C - Performance Testing.

(3) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM. In addition, the Permittee may not change, modify, or reconstruct tanks identified as North and South Tanks without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAM.

(A) The NCR shall contain the information identified in 40 CFR 63.345(b) (2) and (3).

(B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.

(C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks identified as

North and South Tank serves as this notification.

(D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAM before construction, modification, or reconstruction may commence.

(b) Performance Test Results

The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, described in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.

(c) Ongoing Compliance Status Report

The Permittee shall prepare summary reports to document the ongoing compliance status of tanks identified as North and South Tank using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks identified as North and South Tanks are located at site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAM upon request.

(1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).

(A) The first report shall cover the period from the start-up date of the emissions units to December 31 of the year in which the emissions units begin operation.

(B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.

(2) If either of the following conditions are met, semiannual reports shall be prepared and submitted to IDEM, OAM:

(A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time as defined in Condition D.1.8(b) for the reporting period; or

(B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time as defined in Condition D.1.8(b).

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semiannually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

(3) IDEM, OAM may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a ***Minor Source Operating Permit***

Source Background and Description

Source Name:	***Neo Industries (Indiana) Inc.***
Source Location:	***1775 Willow Creek Road, Portage, Indiana 46368***
County:	***Porter***
SIC Code:	***3471***
Operation Permit No.:	**127-11444-00045**
Permit Reviewer:	***Spahi***

The Office of Air Management (OAM) has reviewed an application from Neo Industries (Indiana) Inc. relating to the operation of a hard chromium electroplating plant for metal products.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) hard chromium electroplating tank, identified as North Tank, with a maximum rectifier capacity of fifty thousand (50,000) amperes and maximum capacity to coat four (4) metal rolls per hour, using composite mesh pad system/packed bed scrubber as control, and exhausting at one(1) stack, identified as 1.

(b) One (1) hard chromium electroplating tank, identified as South Tank, with a maximum rectifier capacity of thirty thousand (30,000) amperes and maximum capacity to coat four (4) metal rolls per hour, using composite mesh pad system/packed bed scrubber as control, and exhausting one(1) stack, identified as 1.

(c) Two (2) electrical discharge texturing tanks, identified as EDT1 and EDT2, each with a maximum capacity of one (1) metals roll per hour, using dry mist collectors as control, and exhausting inside the building.

(d) One (1) natural gas-fired boiler, identified as B1, rated at seven-tenths (0.7) million British thermal units (MMBtu) per hour, exhausting at one (1) stack, identified as 2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Exemption 127-2471-00045, issued on June 24, 1992.

All conditions from the previous approval were incorporated into this permit.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
1	North Tank	38	3.67	32,000	Ambient
1	South Tank	38	3.67	32,000	Ambient
2	Boiler B1	38	3.67	Not Known	Ambient

Enforcement Issue

The source has the following enforcement actions pending:

(1) The source did not conduct their second MACT test for their control equipment (composite mesh pad system/packed bed scrubber) in the pressure range determined during their initial MACT test.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 13, 1999, with additional information received on November 17,1999.

Emission Calculations

Chromium emissions(Single HAP) from the biggest source in Indiana are less than (10) tons per year and Neo Industries(Indiana) Inc. is a much smaller source in comparison. So no calculations were necessary for this source because the chromium emissions from this source will be less than ten (10) tons per year.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	0.4
CO	0.3
NO_x	0.3

HAP's	Potential To Emit (tons/year)
Chromium Compounds	Less than 10
TOTAL	Less than 25

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The existing source is subject to 326 IAC 20-8 and but not subject to 326 IAC 2-5.5-1(b)(2) (registration) because the source is not a decorative coating plant instead it is a hard chromium coating plant and the source emits less than major source levels(see statement (a) above). Therefore, the source is subject to the provisions of 326 IAC 2-6.1-3(a).

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
North Tank(Cr)	0.0	0.0	0.0	0.0	0.0	0.0	< 10.0
South Tank(Cr)	0.0	0.0	0.0	0.0	0.0	0.0	< 10.0
Total Emissions	0.0	0.0	0.0	0.0	0.0	0.0	< 25.0

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Severe
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as severe nonattainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Porter County has been classified as severe nonattainment for Ozone. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.0
PM10	0.0
SO_2	0.0
VOC	0.4
CO	0.3
NO_x	0.3

(a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories

(b) These emissions were based on a past permit (Exemption127-2471-00045).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The hard chrome electroplating tanks, identified as North Tank and South Tank, are

subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 14, (40 CFR 63, Subpart N, and 326 IAC 20-8-1). Pursuant to 40 CFR 63, Subpart N, and 326 IAC 20-8-1, the tanks are subject to the following conditions:

(1) The Permittee shall not allow the concentration of total chromium in the exhaust gas stream discharged to the atmosphere from the tanks to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm) of ventilation air (6.6×10^{-6} grains per dry standard cubic foot (gr/dscf)).

(2) An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3) shall be prepared and maintained and shall specify the operation and maintenance criteria for the tanks, the composite mesh pad system/ packed bed scrubber and monitoring equipment.

(3) The Permittee shall submit summary reports to document the ongoing compliance status of the tanks using the Ongoing Compliance Status Report form. This report shall contain the information in 40 CFR 63.347(g)(3) that is applicable.

(A) This report must be completed semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends on June 30 and December 31, respectively) to the address listed in Section C - General Reporting Requirements.

(B) If there are any exceedances of the chromium air emission limit contained in Condition D.1.1, then quarterly reports shall be submitted until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

(4) A performance test demonstrating initial compliance for the tanks was performed on March 12,1997 and a second performance test was performed on September 16,1999. It was determined that the average pressure drop during the first compliance determination test across the system was 5.6 inches of water and the average outlet chromium concentration is 0.0091 mg/dscm and the average pressure drop during the second compliance determination test across the system was 2.5 inches of water and the average outlet chromium concentration was 0.007189 mg/dscm

(A) The Permittee shall monitor and record the pressure drop across the composite mesh pad system/ packed bed scrubber once each day that either tank(North Tank or South Tank) or both tanks are in operation.

(B) The composite mesh pad system/ packed bed scrubber shall be operated within 1.50 to 6.60 inches of water column, the pressure drop value established during the first two performance tests, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests that may be conducted in the future.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Porter County and the potential to emit of VOC and Nox is less than ten (10) tons per year and the potential to emit(PTE) of any of the other criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Emission Limitations for Boilers)

Pursuant to 326 IAC 6-2-4, the particulate matter(PM) from the 0.7 million BTU/hr boiler shall be limited to 0.6 pounds/MMBTU heat input..

Conclusion

The operation of this hard chromium electroplating plant for metal products shall be subject to the conditions of the attached proposed Minor Source Operating Permit 127-11444-00045.